

The Honorable Barbara J. Rothstein

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

HOLLY REIN,

Plaintiff,

v.

RITE AID HEADQUARTERS,
CORPORATION, d/b/a RITE AID, and RITE
AID LEASE MANAGEMENT COMPANY,
d/b/a RITE AID,

Defendants.

RITE AID HEADQUARTERS,
CORPORATION, d/b/a RITE AID, and RITE
AID LEASE MANAGEMENT COMPANY,
d/b/a RITE AID,

Third-Party Plaintiffs,

v.

DURO BAG MANUFACTURING
COMPANY, et. al,

Third-Party Defendants.

Civil Case No. 2:19-cv-00522-BJR

**STIPULATION AND ORDER TO
AMEND COMPLAINT AND ADD
THRIFTY PAYLESS, INC., d/b/a
RITE AID PHARMACY AS THE
NAMED DEFENDANT AND
DISMISSING DEFENDANT RITE
AID HEADQUARTERS,
CORPORATION, d/b/a RITE AID**

Comes now Holly Rein, by and through her attorney of record, Jason H. Schauer, of the
Schauer Law Offices, PLLC, and Defendant Rite Aid Headquarters, Corporation, d/b/a Rite

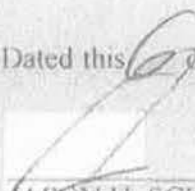
STIPULATION AND ORDER TO RELEASE ONE
DEPENDANT AND ADD ANOTHER

THE SCHAUER LAW OFFICES, PLLC
918 S. Horton St., Ste. 916
Seattle, WA 98134
(206) 420-7112


1 Aid, by and through their attorneys of record, John Barhoum and Jessica Lancaster, of Chock
2 Barhoum, and hereby stipulate and agree as follows:

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- 4 1. Plaintiff shall be admitted to file an Amended Complaint alleging that Thrifty
5 Payless, Inc., d/b/a Rite Aid Pharmacy was and is the appropriate Defendant to
6 be named in this matter who was involved in the incident here at bar
- 7 2. The parties agree that John Barhoum and Jessica Lancaster of Chock Barhoum
8 will then file a notice of appearance as attorneys of record for Thrifty Payless,
9 Inc., d/b/a Rite Aid Pharmacy.
- 10 3. The parties agree that all claims against Rite Aid Headquarters, Corporation,
11 d/b/a Rite Aid shall be dismissed with prejudice upon entry of this order.
- 12 4. John Barhoum and Jessica Lancaster of Chock Barhoum have agreed to accept
13 service of the Amended Summons and Complaint on behalf of Thrifty Payless,
14 Inc., d/b/a Rite Aid Pharmacy.
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17 Dated this 6th of August, 2019.

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20 JASON H. SCHAUER
21 WSBA NO. 30344
22 Attorney for Plaintiff.

17 Dated this 6th of August, 2019.

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20 JOHN BARHOUM
21 WSBA NO. 42776
22 JESSICA LANCASTER
23 WSBA NO. _____
24 Attorneys for Defendants Rite Aid

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STIPULATION AND ORDER TO RELEASE ONE
DEFENDANT AND ADD ANOTHER

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1 **ORDER**

2 Pursuant to the above stipulation, the Court hereby orders as follows:

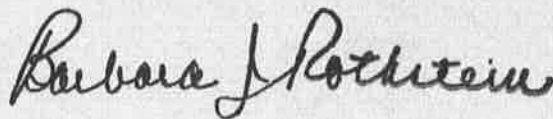
3 1. Plaintiff Rein shall be allowed to file an Amended Complaint under the above-
4 referenced cause number alleging that Thrifty Payless, Inc., d/b/a Rite Aid Pharmacy was
5 responsible for causing the injuries and damage to Plaintiff.

6 2. All causes of action against Defendant Rite Aid Headquarters, Corporation,
7 d/b/a Rite Aid are dismissed with prejudice.

8 3. John Barhoum and Jessica Lancaster of Chock Barhoum will promptly file a
9 notice of appearance as attorneys of record for Thrifty Payless, Inc., d/b/a Rite Aid Pharmacy.
10 Plaintiff Rein is allowed to effectuate service of process on Defendant Thrifty Payless, Inc.,
11 d/b/a Rite Aid Pharmacy by serving a copy of the Amended Summons and Complaint on its
12 attorneys, John Barhoum and Jessica Lancaster of the Chock Barhoum Law Firm.

13 4. The caption in the above-entitled case shall be amended to read Holly Rein v.
14 Thrifty Payless, Inc., d/b/a Rite Aid Pharmacy and Rite Aid Lease Management, Company,
15 d/b/a Rite Aid *et al.*

16 Dated this 9th day of August, 2019.



17 Honorable Barbara J. Rothstein
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2 PRESENTED BY:
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5 JASON H. SCHAUER WSBA 30344
6 Attorney for Plaintiff Rein
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9 COPY RECEIVED: APPROVED AS TO FORM;
10 NOTICE OF PRESENTATION WAIVED
11

12 JOHN BARHOUM
13 WSBA NO. 42776
14 JESSICA LANCASTER
15 WSBA NO.
16 Attorneys for Defendants Rite Aid
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DEFENDANT AND ADD ANOTHER

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